

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

**RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-27 Please refer to the Cavallo Testimony at 9, lines 20-22. How does what is described here differ if at all with the activities undertaken by Bay State on a regular basis since August 1, 1971?

Response: Mr. Cavallo has not independently reviewed the Company's construction records to from 1971 to the present to verify the Company's compliance with the "defense-in-depth" approach. However, Mr. Cote has represented that the Company installs coated, protected steel or plastic pipe.

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